

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 97 of the Commission's	)	WT Docket No. 05-235
Rules	)	
To Implement WRC-03 Regulations	)	RM-10781, RM-10782, RM-10783,
Applicable to Requirements for Operator	)	RM-10784, RM-10785, RM-10786,
Licenses in the Amateur Radio Service	)	RM-10787, RM-10805, RM-10806,
	)	RM-10807, RM-10808, RM-10809,
	)	RM-10810, RM-10811, RM-10867,
	)	RM-10868, RM-10869, RM-10870

**Comments of Richard L. Tannehill - Amateur Callsign W7RT**

**BACKGROUND:**

I have been an amateur radio licensee since 1961, having been launched on a high-tech engineering career via amateur radio as so many were back then. In the 1960s, Morse cw was an important mode of communications to not only communicate with other nationalities and languages, but necessary to understand to avoid interference with other services.

Today however, Morse cw is only one of many modes available to amateurs as an option. However, Morse cw remains the only mode requiring a pass/fail examination in order to operate anywhere in the HF spectrum, even if one only intends to operate on voice or digital modes. Clearly this is an inequitable situation, and as the Commission pointed out in the 2000 Report & Order 98-143, the only reason for maintaining the code examination was the S25.5 requirement of the ITU regulations. We were relieved of this useless and onerous regulation on July 5<sup>th</sup>, 2003, at the conclusion of WRC2003.

**RECOMMENDATION:**

I fully support, and commend the Commission for their view that the Morse cw test is now an obsolete and onerous requirement, not justified by law, and needs to be removed from the amateur radio license testing process. As of this date, I have seen no new arguments presented in comments to this NPRM to justify supporting a test not required by communications necessity or treaty. I do not understand why this change was not issued as a directive by the Commission shortly after WRC2003, as was the allowance of operation in the 7100-7200 KHz band segment in U.S. ITU Regions 1 and 3. However overdue this NPRM may be, I fully support it and suggest it be implemented at the earliest possible date after close of reply comments.

/s/ Richard L. Tannehill, P.E. - W7RT

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